

Justin O. Burton (6506)  
Jeffrey P. Mortimer (14472)  
**RULON T. BURTON & ASSOCIATES**  
Attorney for Debtor(s)  
6000 South Fashion Blvd.  
Murray, Utah 84107  
(801) 288-0202

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH**

In Re:	Case No. 12-31819 RKM
Hossein Rezaian, SSN: xxx-xx-5390, Afagh Mohammadreza, SSN: xxx-xx-1738, Debtors.	Chapter 13 (Filed Electronically)

**NOTICE OF APPLICATION FOR ALLOWANCE OF COMPENSATION  
AND NOTICE OF OPPORTUNITY FOR HEARING**

Objection Deadline: December 11, 2013

PLEASE TAKE NOTICE that Debtors, Hossein Rezaian and Afagh Mohammadreza, have filed with the United States Bankruptcy Court for the District of Utah, an Application for Allowance of Compensation (copy attached).

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)**

The Debtors seek approval of attorney fees for services performed regarding a motion for termination of the automatic stay filed by M&T Bank.

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE COURT ON OR BEFORE THE OBJECTION DEADLINE SET FORTH HEREIN.

If you do not want the Court to grant the relief requested in the Objection then you or your attorney must:

(1) On or before December 11, 2013, file with the Bankruptcy Court (350 So. Main St., Room 301, Salt Lake City, Utah 84101) a written Response explaining your position.

If you mail your response to the Bankruptcy Court for filing you must mail it early enough so that the Court will receive it on or before December 11, 2013. You must also mail a copy to the undersigned counsel at Rulon T. Burton & Associates, 6000 Fashion Blvd., Murray, Utah 84107.

(2) attend a **hearing on December 18, 2013 at 11:00 a.m. in Courtroom 369**, before the Honorable R. Kimball Mosier, U.S. Bankruptcy Court, 350 So. Main St., Salt Lake City, Utah

84101. **There will be no further notice of the hearing** and failure to attend the hearing will be deemed a waiver of your objection.

If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief. In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to enter an Order approving the Motion without hearing.

DATED: November 8, 2013

  
\_\_\_\_\_  
Jeffrey P. Mortimer, of and for  
**Rulon T. Burton & Associates**

**MAILING CERTIFICATE**

Under penalty of perjury, I hereby certify that on Nov 11 2013, I caused to be delivered electronically and/or mailed, postage prepaid, a true and correct copy of the **NOTICE OF APPLICATION FOR ALLOWANCE OF COMPENSATION AND NOTICE OF OPPORTUNITY FOR HEARING** to the following: TO ALL LISTED ON ATTACHED COURT MATRIX DATED November 8, 2013.

  
\_\_\_\_\_  
Mailing Clerk

Justin O. Burton (6506)  
Jeffrey P. Mortimer (14472)  
**RULON T. BURTON & ASSOCIATES**  
Attorney for Debtor(s)  
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**IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH**

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In Re:	Case No. 12-31819 RKM
Hossein Rezaian, SSN: xxx-xx-5390, Afagh Mohammadreza, SSN: xxx-xx-1738,	Chapter 13
Debtors.	(Filed Electronically)

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**APPLICATION FOR ALLOWANCE OF COMPENSATION**

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Under penalty of perjury the undersigned respectfully represents as follows:

Jeffrey P. Mortimer was admitted to practice law in 2013. Prior to that time, since 1983, he was a paralegal specializing in Chapter 7, 11 and 13. He spends 90% of his billable time representing Chapter 7 and 13 clients. He regularly appears before the Bankruptcy Court for the District of Utah. Justin Burton has practiced law since 1993. He clerked for the applicant firm during the summers of 1991 and 1992, and has had previous Bankruptcy experience with Rulon T. Burton & Associates. Mr. Burton spends 90% of his time on Chapter 7 and Chapter 13 matters.

All professional services for which compensation is requested were actually performed by the applicant on behalf of the Debtors, Hossein Rezaian and Afagh Mohammadreza, being in the opinion of the applicant, both reasonable and necessary. The applicant purports to have exercised reasonable billing judgment. The applicant firm, Rulon T. Burton and Associates, is Counsel for Hossein Rezaian and Afagh Mohamadreza and makes this Application for Allowance of Compensation for professional service rendered and the reimbursement of out-of-pocket expense necessarily incurred by the applicant in the representation of said Debtors in the total amount of \$696.00. Attached here as Exhibit A is a complete accounting for the time spent. All time records summarized in the application are records made at the time services were rendered. The rate the Applicant charges per hour is JOB \$300.00 and JPM \$220.00 and is consistent with the amount billed on all other Chapter 7 and Chapter 13 matters.


The rates charged by applicant firm were at all times, since the inception of these proceedings, the normal charges for similar work performed for other clients and are consistent with the rates previously viewed by the Court and charged in the State of Utah by attorneys in a

similar expertise.

Other than in connection with this matter, the applicant firm has no relationship with the Debtors, nor does it expect to have any further relations except for winding up these proceedings.

WHEREFORE, the Applicant firm prays the Court to enter its Order authorizing its compensation and payment of fees to Rulon T. Burton & Associates in the total amount of \$696.00.

Respectfully submitted this November 8, 2013.

  
\_\_\_\_\_  
Jeffrey P. Mortimer, of and for,  
Rulon T. Burton & Associates

**EXHIBIT "A"**

08/22/13			
08/27/13	JOB	Correspondence & confer w/Client(s) re: Motion for Relief filed on behalf of <b>M&amp;T Bank's</b> Review File and documentation	0.4
08/30/13	JOB	Draft Objection	0.4
09/06/13			
09/13/13			
09/16/13	JPM	Review & respond to e-mail(s) re Agreed Order	0.6
09/16/13			
09/18/13	JPM	Endorse and transmit Agreed Order to Clients	0.4
11/08/13	JPM	Prepare Application for Compensation	0.4
12/04/13	JPM	Attend Hearing re Fee Application	0.5

0.8 JOB hours at \$300.00 per hour =	\$240.00	
1.9 JPM hours at \$220.00 per hour =	<u>\$418.00</u>	\$658.00
Copies: 3 pgs. x 50 labels x \$0.10 =	\$15.00	
Postage: 50 x \$0.46 =	<u>\$23.00</u>	\$ 38.00
		<u>\$696.00</u>

Label Matrix for local noticing  
1088-2  
Case 12-31819  
District of Utah  
Salt Lake City  
Fri Nov 8 15:36:52 MST 2013

American Express Bank FSB  
c/o Becket and Lee LLP  
POB 3001  
Malvern PA 19355-0701

(p)AUTOMOTIVE FINANCE CORPORATION  
13085 HAMILTON CROSSING BLVD  
SUITE 300  
CARMEL IN 46032-1445

Bank of America  
PO Box 5170  
Simi Valley, CA 93062-5170

Chase Home Finance  
PO Box 78420  
Phoenix, AZ 85062-8420

Dealer Services Corporation  
1320 City Center Drive, Suite 100  
Carmel, IN 46032-3816

FIA CARD SERVICES, N.A.  
4161 Piedmont Parkway  
NC4 105 03 14  
Greensboro, NC 27410

Integra Telcom  
265 E. 100 So. Suite 200  
Salt Lake City, UT 84111-1739

M & T Bank Commercial Loans  
PO Box 1302  
Buffalo, NY 14240-1302

Main Street Acquisition Corp assignee of CHA  
BANK USA N A  
c/o Becket and Lee LLP  
POB 3001  
Malvern PA 19355-0701

American Express  
PO Box 297804  
Fort Lauderdale, FL 33329-7804

American Express Blue Cash  
PO Box 981535  
El Paso TX 79998-1535

Azurea I, LLC  
c/o Weinstein & Riley, P.S.  
2001 Western Ave., Ste. 400  
Seattle, WA 98121-3132

Bonded Collection Corp.  
CS Bond 01  
PO Box 1022  
Wixom MI 48393-1022

Chase cardmember Services  
PO Box 94014  
Palatine, IL 60094-4014

Department Stores National Bank/Macy's  
Bankruptcy Processing  
Po Box 8053  
Mason, OH 45040-8053

GE Capital Retail Bank  
Care of Recovery Management Systems Corp  
25 S.E. 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

JPMorgan Chase Bank, N.A.  
c/o Chase Records Center  
Attn: Correspondence Mail  
700 Kansas Lane  
Monroe, LA 71203-4774

M&T BANK  
c/o PITE DUNCAN, LLP  
4375 Jutland Drive, Suite 200  
P.O. Box 17933  
San Diego, CA 92177-7921

Mark E. Medcalf  
160 East 300 South, Fifth Floor  
P.O. Box 140857  
Salt Lake City, UT 84114-0857

American Express  
PO Box 650448  
Dallas TX 75265-0448

Kevin R. Anderson tr  
405 South Main Street  
Suite 600  
Salt Lake City, UT 84111-3408

Jesse A.P. Baker  
Pite Duncan LLP  
4375 Jutland Drive, Suite 200  
PO Box 17933  
San Diego, CA 92177-7921

Justin O. Burton  
Rulon T. Burton & Assoc.  
6000 South Fashion Blvd.  
Murray, UT 84107-5436

Comcast  
1350 Miller Avenue  
SLC, UT 84106-3092

Dillard's National Bank  
PO Box 52051  
Phoenix, AZ 85072-2051

IRS  
Centralized Insolvency Operations  
PO Box 7346  
Philadelphia, PA 19101-7346

Johnson Mark LLC  
PO Box 7811  
Sandy, UT 84091-7811

Macy's  
PO Box 8053  
Mason, OH 45040-8053

Mark S. Middlemas  
Lundberg & Associates  
3269 South Main Street  
Suite 100  
Salt Lake City, UT 84115-3773

Afagh Mohammadreza  
14029 So. Candy Pull Drive  
Draper, UT 84020-7512

NCB Management Services, Inc.  
PO Box 1099  
Langhorne, PA 19047-6099

PNC Mortgage  
PO Box 1820  
Dayton, OH 45401-1820

(p)PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

RC Willey Home Furnishings  
PO Box 410429  
Salt Lake City, UT 84141-0429

Hossein Rezaian  
14029 So. Candy Pull Drive  
Draper, UT 84020-7512

Shahram Rezaian  
14029 So. Candy Pull Drive  
Draper, UT 84020-7512

TD BANK USA, N.A.  
C O WEINSTEIN AND RILEY, PS  
2001 WESTERN AVENUE, STE 400  
SEATTLE, WA 98121-3132

Target National Bank  
PO Box 660170  
Dallas TX 75266-0170

USTC  
Attn: Bankruptcy Unit  
210 North 1950 West  
Salt Lake City, UT 84134-7040

United States Trustee  
Ken Garff Bldg.  
405 South Main Street  
Suite 300  
Salt Lake City, UT 84111-3402

Utah Labor Commission  
Mark E. Medcalf #5404  
160 East 300 South, Fifth Floor  
PO Box 140857  
Salt Lake City, UT 84114-0857

Wells Fargo  
ATTN: Recovery Dept  
PO BOX 5058  
Sioux Falls, SD 57117

Wells Fargo  
Business Direct Op  
PO Box 348750  
Sacramento CA 95834-8750

Wells Fargo  
PO Box 54349  
Los Angeles CA 90054-0349

Wells Fargo Bank  
PO Box 63491 MAC A0143-042  
San Francisco, Ca 94163-0001

Wells Fargo Bank, N.A.  
Business Direct Division  
P.O. Box 29482  
Phoenix, AZ 85038-9482

Wells Fargo Bank, N.A.  
P.O. Box 10438  
Des Moines, Iowa 50306-0438

Wells Fargo Card Services  
1 Home Campus  
3rd Floor  
Des Moines, IA 50328-0001

James H. Woodall  
10808 River Front Parkway  
Suite 175  
South Jordan, UT 84095-5961

Mark S. x4Middlemas  
Lundberg & Associates  
3269 South Main Street  
#100  
Salt Lake City, UT 84115-3773

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Auto Finance Corporation  
13085 Hamilton Crossing Blvd., Suite 300  
Carmel, IN 46032

Portfolio Recovery Associates, LLC  
PO Box 41067  
Norfolk VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)JPMorgan Chase Bank, National Association

(u)M&T Bank

(u)RC Willey Financial Services

(u)Utah Labor Commission

(d)Wells Fargo Card Services  
1 Home Campus 3rd Floor  
Des Moines, IA 50328-0001

End of Label Matrix	
Mailable recipients	50
Bypassed recipients	5
Total	55